



**BellSouth Telecommunications, Inc.**

333 Commerce Street  
Suite 2101  
Nashville, TN 37201-3300

guy.hicks@bellsouth.com

**Guy M. Hicks**  
General Counsel

615 214-6301  
Fax 615 214-7406

REC'D TN  
RECEIVED  
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October 23, 2000  
EXECUTIVE SECRETARY

VIA HAND DELIVERY

David Waddell, Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37238

Re: *Generic Docket to Establish UNE Prices for Line Sharing per FCC 99-355 and Riser Cable and Terminating Wire as Ordered in TRA Docket No. 98-00123*  
Docket No. 00-00544

Dear Mr. Waddell:

Enclosed are fourteen copies of BellSouth's responses to Sprint's First Set of Interrogatories and First Set of Requests for Production. Attachment No. 1 to BellSouth's response to Item No. 1 of Sprint's First Request for Production contains proprietary information and is being submitted under separate cover subject to the terms of the Protective Order entered in this proceeding.

Copies of the enclosed have been provided to counsel of record for all parties.

Very truly yours,

Guy M. Hicks

GMH:ch  
Enclosure

REQUEST: Does BellSouth allow for the line splitter to be directly wired from the splitter to the CLEC collocation area? If not, please explain why?

RESPONSE: No. In early discussions with the CLEC collaborative, this topic was met with mixed reviews. Some CLECs wanted hard-wired cabling between the DSLAM and the splitter, while others did not want to dedicate an entire 24-pair count to that purpose. The foremost reason that BellSouth did not chose this option was the fact that, when the splitter shelves are being installed by the turf vendor, BellSouth does not know which CLEC will be purchasing each shelf or portion of a shelf. After a CLEC orders their splitters in multiples of 24, the installation vendor would have to go back and install these cables, possibly working among other cables already carrying service. The same installation problem would exist in the future as one CLEC disconnects their 24-count and another requests a new 24-count, cables would have to be removed and installed accordingly, all done amidst the other cables carrying service. The necessity for the vendor to revisit each shelf before service could be established would also lengthen the splitter availability interval.

In addition, these proposed direct cables from the CLEC DSLAM to the splitter shelf could actually bypass the existing collocation rules and procedures. Existing collocation procedures dictate how a CLEC requests new collocation terminations when needed. Directly cabling from a collocation space to a BellSouth equipment lineup would need to follow those existing procedures.

BellSouth interfaces with the CLEC's data signal using the existing CLEC collocation termination arrangements, whether those are POT bays or frame appearances on the Toll MDF. From these previously established meet points, a cross-connect is run to the frame appearance of the splitter.

BellSouth Telecommunications, Inc.  
TN TRA Dkt No. 00-00544  
Sprint's 1<sup>st</sup> Set of Interrogatories  
October 13, 2000  
Item No. 2  
Page 1 of 1

REQUEST: Reference page 001721, Line 28, of BellSouth's Supplemental cost study filed October 2, 2000 ("Cost Study"). Please explain why 4 connecting blocks are required?

RESPONSE: Four connecting blocks are used because each of the four 24-line groups in the 96-line splitter is dedicated to a connecting block.

BellSouth Telecommunications, Inc.  
TN TRA Dkt No. 00-00544  
Sprint's 1<sup>st</sup> Set of Interrogatories  
October 13, 2000  
Item No. 3  
Page 1 of 1

REQUEST: Provide the manufacturer and product number of the Distribution Frame on line 10 on page 001721 of the Cost Study.

RESPONSE: The manufacturer for the frame is Lucent and the product ID is ED6C736-30 G-6.

BellSouth Telecommunications, Inc.  
TN TRA Dkt No. 00-00544  
Sprint's 1<sup>st</sup> Set of Interrogatories  
October 13, 2000  
Item No. 4  
Page 1 of 1

REQUEST: Provide the manufacturer and product number for the Line Sharing splitter bay on line 36 on page 001721 of the Cost Study.

RESPONSE: The material cost for the Line Share Splitter Bay is considered Minor Material Components for the mounting of the bay. Included in the minor material is: lugnuts for bolting the equipment to the floor; frame grounding; lettering and numbering; 1/3 of lighting costs; 1/3 of cable racking costs; bay extenders; end guards; spacers; and, guard rails, as appropriate. BellSouth Installation vendors are required to procure these items. Therefore, BellSouth does not have the information requested.

BellSouth Telecommunications, Inc.  
TN TRA Dkt No. 00-00544  
Sprint's 1<sup>st</sup> Set of Interrogatories  
October 13, 2000  
Item No. 5  
Page 1 of 1

REQUEST: Explain how the system capacity for the line sharing splitter bay of 8 (Page 001721, line 40 of the Cost Study) was determined?

RESPONSE: Based on the size of the bay, it has a capacity for 8 splitters with each having a corresponding test shelf.

BellSouth Telecommunications, Inc.  
TN TRA Dkt No. 00-00544  
Sprint's 1<sup>st</sup> Set of Interrogatories  
October 13, 2000  
Item No. 6  
Page 1 of 1

REQUEST: Reference page 001721, line 48 of the Cost Study. What investment items are recovered with the input for Line Sharing Splitter (Shelf, Test Equip, Plug-ins & Cabling)?

RESPONSE: The items recovered on line 48 line sharing splitter material are the splitter, test access shelf, bay and connectorized cables.

BellSouth Telecommunications, Inc.  
TN TRA Dkt. No. 00-00544  
Sprint's 1<sup>st</sup> Request for Production  
of Documents  
Item No. 1  
Page 1 of 1

REQUEST: On page 001721, line 48 of the Cost Study, please provide the cost study that relates to the input for Line Sharing Splitter (Shelf, Test Equip, Plug-ins & Cabling).

RESPONSE: A cost study for the requested items does not exist. However, see Attachment No. 1 for the supporting document for these inputs. This document contains proprietary information and is subject to the provisions of the nondisclosure agreement executed by Sprint.



REQUEST: Reference the Affidavit of Jerry Hendrix filed by BellSouth in this case on August 18, 2000 and Exhibit JH-1 attached thereto. On page 3 of 6 of Exhibit JH-1, source footnote 4 (as defined on page 6 of 6) references "Cost results filed on August 18, 2000 with the Florida Public Service Commission in Docket No. 99649-TP" as the source of several rates ("Florida Docket"). Please provide the following information as it relates to the Florida Docket:

- a) Please provide the cost study referenced in the Florida Docket including all inputs, cost factors, models and all other information used to develop the rates.

RESPONSE: BellSouth objects to this request to the extent that it seeks information which is not relevant to the issues presented to the Authority in this proceeding. Moreover, BellSouth objects to this request because it is burdensome. In any event, (1) Sprint is already in possession of the requested information because Sprint was a party to the Florida docket; and (2) Mr. Hendrix's affidavit was submitted in connection with the Hearing Officer's order imposing interim rates and the affidavit has no bearing on the permanent rates to be established in this proceeding.

REQUEST: Reference the Affidavit of Jerry Hendrix filed by BellSouth in this case on August 18, 2000 and Exhibit JH-1 attached thereto. On page 3 of 6 of Exhibit JH-1, source footnote 4 (as defined on page 6 of 6) references "Cost results filed on August 18, 2000 with the Florida Public Service Commission in Docket No. 99649-TP" as the source of several rates ("Florida Docket"). Please provide the following information as it relates to the Florida Docket:

- b) Please provide the questions and answers to all discovery issued to BellSouth in the Florida Docket regarding the cost study produced in response to item 2.a).

RESPONSE: BellSouth objects to this request to the extent that it seeks information which is not relevant to the issues presented to the Authority in this proceeding. Moreover, BellSouth objects to this request because it is burdensome. In any event, (1) Sprint is already in possession of the requested information because Sprint was a party to the Florida docket; and (2) Mr. Hendrix's affidavit was submitted in connection with the Hearing Officer's order imposing interim rates and the affidavit has no bearing on the permanent rates to be established in this proceeding.

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- c) Please provide any commission orders or decisions issued in the Florida Docket regarding the cost study produced in response to item 2.a).

RESPONSE: BellSouth objects to this request because it seeks the production of documents which are a matter of public record, therefore, equally available to Sprint. Moreover, Mr. Hendrix's affidavit was submitted in connection with the Hearing Officer's order imposing interim rates and the affidavit has no bearing on the permanent rates to be established in this proceeding.

REQUEST: Reference the Affidavit of Jerry Hendrix filed by BellSouth in this case on August 18, 2000 and Exhibit JH-1 attached thereto. On page 3 of 6 of Exhibit JH-1, source footnote 4 (as defined on page 6 of 6) references "Cost results filed on August 18, 2000 with the Florida Public Service Commission in Docket No. 99649-TP" as the source of several rates ("Florida Docket"). Please provide the following information as it relates to the Florida Docket:

- d) If hearings in the Florida Docket have been completed, please provide the transcript from the hearings regarding the cost study produced in response to item 2.a).

RESPONSE: BellSouth objects to this request because it seeks the production of documents which are a matter of public record, therefore, equally available to Sprint. Moreover, Mr. Hendrix's affidavit was submitted in connection with the Hearing Officer's order imposing interim rates and the affidavit has no bearing on the permanent rates to be established in this proceeding.

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e) Please provide any direct, rebuttal, surebuttal, supplemental and any other type of testimony filed by BellSouth in the Florida Docket regarding the cost study produced in response to item 2.a).

RESPONSE: BellSouth objects to this request because it seeks the production of documents which are a matter of public record, therefore, equally available to Sprint. Moreover, Mr. Hendrix's affidavit was submitted in connection with the Hearing Officer's order imposing interim rates and the affidavit has no bearing on the permanent rates to be established in this proceeding.

**CERTIFICATE OF SERVICE**

I hereby certify that on October 23, 2000, a copy of the foregoing document was served on the parties of record, via the method indicated:

<input type="checkbox"/> Hand	Jon E. Hastings, Esquire
<input type="checkbox"/> Mail	Boult, Cummings, et al.
<input checked="" type="checkbox"/> Facsimile	P. O. Box 198062
<input type="checkbox"/> Overnight	Nashville, TN 37219-8062
<input type="checkbox"/> Hand	James Wright, Esq.
<input type="checkbox"/> Mail	United Telephone - Southeast
<input checked="" type="checkbox"/> Facsimile	14111 Capitol Blvd.
<input type="checkbox"/> Overnight	Wake Forest, NC 27587
<input type="checkbox"/> Hand	Charles B. Welch, Esquire
<input type="checkbox"/> Mail	Farris, Mathews, et al.
<input checked="" type="checkbox"/> Facsimile	205 Capitol Blvd, #303
<input type="checkbox"/> Overnight	Nashville, TN 37219
<input type="checkbox"/> Hand	James Lamoureux, Esquire
<input type="checkbox"/> Mail	AT&T
<input checked="" type="checkbox"/> Facsimile	1200 Peachtree St., NE
<input type="checkbox"/> Overnight	Atlanta, GA 30309
<input type="checkbox"/> Hand	T. G. Pappas, Esquire
<input type="checkbox"/> Mail	R. Dale Grimes, Esquire
<input checked="" type="checkbox"/> Facsimile	Bass, Berry & Sims
<input type="checkbox"/> Overnight	315 Deaderick Street
	Nashville, TN 37238
<input type="checkbox"/> Hand	Henry Walker, Esquire
<input type="checkbox"/> Mail	Boult, Cummings, et al.
<input checked="" type="checkbox"/> Facsimile	414 Union Ave., #1600
<input type="checkbox"/> Overnight	P. O. Box 198062
	Nashville, TN 37219-8062
<input type="checkbox"/> Hand	Joshua M. Bobeck, Esquire
<input type="checkbox"/> Mail	Swidler Berlin, et al.
<input checked="" type="checkbox"/> Facsimile	3000 K St., NW, #300
<input type="checkbox"/> Overnight	Washington, DC 20007-5116

A handwritten signature in black ink, consisting of a stylized 'J' followed by a horizontal line and a large loop.